



# Bristol Bay Native Corporation

*Enriching Our Native Way of Life*

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August 1, 2012

The Honorable Lisa Murkowski  
U.S. Senate  
709 Hart Senate Building  
Washington, DC 20510

Dear Senator Murkowski,

As you know, your staff has been reaching out to identify issues of concern to Alaskans and, separately, we have had a continuing conversation with you about responsible development and what it means in Bristol Bay. This email responds to your staff's inquiry and continues our conversation.

First of all, we would like to thank you for tracking legislation related to offshore drilling. We noticed that the latest bill in the Senate does not include a North Aleutian Basin lease sale, and for this we are appreciative.

Second, you recently questioned the Environmental Protection Agency (EPA) at an Indian Affairs Committee hearing about consultation between EPA and Alaska Native Regional Corporations (ANCs). Thank you for urging EPA to communicate with BBNC and consider our interests in their decision making as we are an impacted landowner.

Third, you also questioned EPA at that hearing about the adequacy of the Draft Bristol Bay Watershed Assessment comment period and the extent of consultation with tribes and ANCs. I want to assure you that Bristol Bay Native Corporation (BBNC) has had more than ample time to review and comment on the assessment, and that we have had good communications with EPA on that front. Further, having participated in the EPA hearings in-region, we can also attest to the remarkable local involvement in EPA's assessment process -- each of the six hearings in-region essentially were standing-room-only and EPA gave anyone who wanted to speak the opportunity to do so. You can see these numbers for yourself in the attached hearing results summary.

We have also been in close contact with many tribal entities in the region about the assessment, and have heard many compliments on EPA's outreach and consultation and very few complaints about the extent of the comment period. Prior to the public comment period EPA informed us and other regional interests of their plans, and then provided an ample 60+ day comment period. Indeed, comment periods on 404 permits, mining or state land use decisions traditionally have been far shorter than this.

Finally, our analysis of EPA's assessment shows that EPA actually has been conservative in its estimation of impacts on salmon of large scale metallic sulfide mining of the type that would be needed to mine the Pebble ore deposit. We remain firm in our belief that the proposed Pebble mine would result in unacceptable adverse effects to Bristol Bay salmon, and believe that EPA should use its 404(c) authority to place common sense sideboards to protect our salmon on any future 404 permits for the proposed Pebble mine. Doing so would establish the primary ground rules for such a permit up front, allow Pebble Limited Partnership to address them in their initial 404 application should they choose to file one. Notably, such wild salmon sideboards also would not preclude a NEPA process. We urge you to support our efforts in this regard.

Sincerely,

Don Metrokin  
President & CEO

**EPA Draft Bristol Bay Watershed Assessment  
Public Hearings  
Summary of Initial Results**

**ALL HEARING TOTALS:**

Meeting Attendees:	~2294	
People Testifying:	453	
Testimonies supporting EPA and watershed Assessment:	364	
% or Total testifiers that support EPA and assessment:		80.3%

**BRISTOL BAY REGIONAL HEARING TOTALS**

Meeting Attendees:	~964	
People Testifying:	275	
Testimonies supporting EPA and watershed Assessment:	258	
% or Total testifiers that support EPA and assessment:		93.8%

**HEARING-BY-HEARING BREAKDOWN**

**Seattle, May 31, 2012**

~330 people in attendance

71 individuals testified, with 81% (58 of 71) supportive of EPA and watershed assessment.

**Anchorage, June 4, 2012**

~1,000 people in attendance

107 individuals testified, with 45% (48 of 107) supportive of EPA and watershed assessment.

**Dillingham, June 5, 2012**

~325 people in attendance

90 individuals testified, with 100% supportive of EPA and watershed assessment.

**Naknek, June 5, 2012**

~280 people in attendance

61 individuals testified, with 93% (57 of 61) supportive of EPA and watershed assessment.

**Levelock, June 6, 2012**

~60 people in attendance

25 individuals testified, with 100% supportive of EPA and watershed assessment.

**Igiugig, June 6, 2012**

~75 people in attendance

25 individuals testified, with 88% (22 of 25) supportive of EPA and watershed assessment.

**New Stuyahok, June 7, 2012**

~124 people in attendance

41 individuals testified, with 92% (38 of 41) supportive of EPA and watershed assessment.

**Nondalton, June 7, 2012**

~100 people in attendance

33 individuals testified, with 79% (26 of 33) supportive of EPA and watershed assessment.

**For information on the manner in which these numbers were collected please co  
Daniel Cheyette, Attorney, Bristol Bay Native Corporation at (907) 278-3602**